

SUMMARY OF SUBMISSIONS

Doley Road Precinct Local Structure Plan Amendment No.2 - PA24/268

Advertising Date: 6 June 2024 to 18 July 2024

Submitter	No	Submitter Comments	Officer Comment	Applicant Comment
Government Agencies				
Department of Transport (DOT) IN24/15191	1.	<p>Thank you for your letter dated 6 June 2024 inviting the Department of Transport (DoT) to comment on Amendment No. 2 to the Doley Road Precinct Local Structure Plan (LSP). The Urban Mobility (UM) division of DoT has no objection to this proposal however provides the following comments.</p> <ul style="list-style-type: none"> Section 6.4 of Part One and Section 3.5 of Part Two of the Doley Road Precinct LSP refers to “dual use paths”, which is no longer a current term or reference, and the reference should be updated to “shared paths”. Since the original LSP was adopted, the LTCN has been endorsed by the Shire of Serpentine-Jarrahdale at its Council Meeting of 20 April 2020. Within the context of this LSP, Doley Road and Warrington Road are identified as Local Routes, whilst Oroton Road is designated as a Secondary Route. DoT requests that the Shire considers taking the opportunity to update the LSP include reference the LTCN hierarchy as part of this amendment. Cycling and walking infrastructure should be provided accordingly. <p>The <i>Shared and Separated Path Guidelines</i> provide further guidance on the appropriate planning and design of Shared and Separated Paths, and can be found here on DoT's Website: https://www.transport.wa.gov.au/mediaFiles/active-transport/AT_CYC_P_Shared_and_separated_paths.pdf</p>	Thank you for your submission. These comments have been incorporated within the Schedule of Modifications.	<p>The project team would have no objection to the Shire recommending a modification to respond to the first dot point.</p> <p>The second dot point requires a broader edit to the LSP that doesn't appear to be necessary, as the LTCN will be applied by the Shire in its own right, regardless of whether it is referenced in the LSP.</p>

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Department of Energy, Mines, Industry Regulation and Safety (DMIRS) IN24/15732	2.	The Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) has determined that this proposal raises no significant issues with respect to mineral and petroleum resources, geothermal energy, and basic raw materials.	Thank you for your submission.	Noted.
Department of Biodiversity, Conservation and Attractions (DBCA) IN24/15040	3.	The Department of Biodiversity Conservation and Attractions (DBCA) - Swan Region Office has no comments on the proposal. It is understood that the modifications all relate to Lot 32 Doley Road Byford.	Thank you for your submission.	Noted.
Department of Fire and Emergency Services (DFES) IN24/15880	4.	<p>I refer to your email dated 6 June 2024 regarding the submission of a Bushfire Management Plan (BMP) (Version 1), prepared by Eco Logical Australia and dated 23 March 2023, for the above development application.</p> <p>This advice relates only to State Planning Policy 3.7 Planning in Bushfire Prone Areas (SPP 3.7) and the Guidelines for Planning in Bushfire Prone Areas (Guidelines). It is the responsibility of the proponent to ensure the proposal complies with relevant planning policies and building regulations where necessary. This advice does not exempt the applicant/proponent from obtaining approvals that apply to the proposal including planning, building, health or any other approvals required by a relevant authority under written laws.</p>	Thank you for your submission. These comments have been incorporated within the Schedule of Modifications. Shire Officers do not support the BAL Report in its current state, in relation to vegetation classification and the classification of the Multiple Use Corridor (MUC) as low threat. The Shire has recommended that a revised BAL Report be prepared.	<p>The new POS proposal will not increase the risk of SPP 3.7 non-compliance relative to the existing POS proposal.</p> <p>DFES's comments reflect similar discussion points between the Shire and our project team over recent years for various subdivision applications. The LSP area is characterised by fragmented land ownership and this has led to instances of temporary, site-specific land management arrangements to ensure</p>

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		<p>Assessment</p> <p>1. Policy Measure 6.5 a) (ii) Preparation of a BAL contour map</p> <table border="1" data-bbox="506 566 1310 879"> <thead> <tr> <th data-bbox="506 566 645 592">Issue</th> <th data-bbox="645 566 1160 592">Assessment</th> <th data-bbox="1160 566 1310 592">Action</th> </tr> </thead> <tbody> <tr> <td data-bbox="506 592 645 879">Vegetation classification</td> <td data-bbox="645 592 1160 879"> <p>There is insufficient evidence to exclude to the entirety of vegetation Plot 1. Specifically, lots 133 and 134 Doley Road. These lots are large rural lots with a foliage cover in excess of 15%. A low threat classification is consistent with the APZ standard which requires a foliage cover 15% or less.</p> <p>DFES does not accept fire break notices on adjoining land as part of the vegetation management required to achieve an APZ or low-threat classification. Fire break notices may only apply for part of the year and may be varied from year to year by the responsible local government.</p> </td> <td data-bbox="1160 592 1310 879"> <p>Insufficient information. Decision maker to be satisfied with the vegetation management proposed.</p> </td> </tr> </tbody> </table> <p>2. Policy Measure 6.5 c) Compliance with the Bushfire Protection Criteria</p> <table border="1" data-bbox="495 1005 1292 1251"> <thead> <tr> <th data-bbox="495 1005 613 1031">Element</th> <th data-bbox="613 1005 1140 1031">Assessment</th> <th data-bbox="1140 1005 1292 1031">Action</th> </tr> </thead> <tbody> <tr> <td data-bbox="495 1031 613 1251">All</td> <td data-bbox="613 1031 1140 1251"> <p>Bushfire Protection Criteria - not addressed</p> <p>SPP 3.7 requires that, for areas above BAL- LOW, each of the bushfire protection criteria should be demonstrated. This information can be in the form of a Bushfire Management Plan (BMP) or an amended BMP where one has been previously endorsed. This has not been undertaken in accordance with SPP 3.7 and the Guidelines within the submitted BMP.</p> </td> <td data-bbox="1140 1031 1292 1251"> <p>Compliance with Bushfire Protection Criteria to be demonstrated should the vegetation exclusion remain unvalidated.</p> </td> </tr> </tbody> </table>	Issue	Assessment	Action	Vegetation classification	<p>There is insufficient evidence to exclude to the entirety of vegetation Plot 1. Specifically, lots 133 and 134 Doley Road. These lots are large rural lots with a foliage cover in excess of 15%. A low threat classification is consistent with the APZ standard which requires a foliage cover 15% or less.</p> <p>DFES does not accept fire break notices on adjoining land as part of the vegetation management required to achieve an APZ or low-threat classification. Fire break notices may only apply for part of the year and may be varied from year to year by the responsible local government.</p>	<p>Insufficient information. Decision maker to be satisfied with the vegetation management proposed.</p>	Element	Assessment	Action	All	<p>Bushfire Protection Criteria - not addressed</p> <p>SPP 3.7 requires that, for areas above BAL- LOW, each of the bushfire protection criteria should be demonstrated. This information can be in the form of a Bushfire Management Plan (BMP) or an amended BMP where one has been previously endorsed. This has not been undertaken in accordance with SPP 3.7 and the Guidelines within the submitted BMP.</p>	<p>Compliance with Bushfire Protection Criteria to be demonstrated should the vegetation exclusion remain unvalidated.</p>		<p>appropriate management of bushfire hazards (vegetation).</p> <p>The above does not signal a broader issue with the compliance of this LSP (in its current form or in its proposed amended form) with SPP 3.7, which is the relevant question for this stage of the process.</p> <p>At the subdivision stage, as normal, land management measures will be agreed between the developer and the Shire to ensure compliance with SPP 3.7.</p>
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		<p>Recommendation – insufficient information</p> <p>The decision maker should be satisfied that the measures can be achieved and confirm the requirements as outlined above, this can be done without further referral to DFES. If the above</p> <p>bushfire management measures cannot be confirmed the outcomes within the BMP may be inaccurate.</p>		
Main Roads Western Australia (MRWA)	5.	<p>In response to your correspondence and additional information received on 21 June 2024, Main Roads has no objection to the above proposal.</p> <p>Main Roads requests a copy of the City's final determination on this proposal to be sent to planninginfo@mainroads.wa.gov.au.</p>	Thank you for your submission.	Noted.
Department of Water and Environmental Regulation (DWER)	6.	<p>Thank you for providing the application for an amendment to the Doley Road Precinct local structure plan (LSP) received with correspondence on 6 June 2024 for the Department of Water and Environmental Regulation (the Department) to consider. The Department has reviewed the proposed structure plan amendment and provides the following advice.</p> <p>LWMS</p> <p>Urban Water Management</p> <p>Consistent with <i>Better Urban Water Management</i> (BUWM) (WAPC, 2008) and policy measures outlined in the draft <i>State Planning Policy 2.9, Water Resources</i>, the proposed Structure</p>	Thank you for your submission. Shire officers support the advice that given the minor nature of the proposed structure plan amendment, and is of the view that an LWMS Addendum is not required and the existing approved LWMS, paired with an Urban Water Management Plan (UWMP) at the subdivision stage provides sufficient	Noted.

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		<p>Plan should be supported by a Local Water Management Strategy (LWMS) prior to final approval of the Structure Plan.</p> <p>The LWMS should demonstrate how the subject area will address water use and stormwater management. It should contain a level of information that demonstrates the site constraints and the level of risk to the water resources.</p> <p>The Department reviewed the supporting LWMS, <i>Byford, Doley Road LWMS</i> (Essential Environmental, August 2016) and it was deemed satisfactory to the Department. Given the minor changes proposed in this amendment, the Department has no objections to the amendment to the Doley Road Precinct Local Structure Plan proceeding.</p> <p>In the event there are modifications to the proposal that may have implications on aspects of environment and/or water management, the Department should be notified to enable the implications to be assessed.</p>	<p>information to support the Local Structure Plan.</p>	
Department of Education IN24/16422	of 7.	<p>Thank you for your letter dated 6 June 2024 requesting comments from the Department of Education (Department) with the opportunity to comment on the abovementioned amendment to the Doley Road Precinct Local Structure Plan (LSP).</p> <p>The proposed amendment area falls within the student local intake areas for Beenyup Primary School and Woodland Grove Primary School. Both schools will be operating above their current student capacity in the medium term. The estimated number of additional dwellings that will result from the modifications to the residential areas has not been specified</p>	<p>Thank you for your submission. Shire Officers consider the modification to the proposed dwelling yield to be minor in nature, and the amendment is not expected to have a significant impact on additional student yields.</p>	Noted.

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		<p>however any additional student yield from the proposed amendment will impact the accommodation capacity and operations of the two primary schools referenced above.</p> <p>The Department has previously advised the Shire of Serpentine Jarrahdale (Shire) of its concerns in relation to the under provision of public primary school sites within Byford. However, it is noted in the application that a Residential Code Plan is to be submitted at the time of subdivision to the Western Australian Planning Commission and therefore, the Department will continue to review and monitor the residential growth and resultant student enrolment demand as development eventuates across the locality. The Department wishes to continue to work with the Shire to ensure a sufficient number of public school sites are planned for within the wider area.</p> <p>In view of the above, the Department has no in principle objections to the proposed amendment to Structure Plan. In addition, any requirement for primary school developer contributions will be applied at the subdivision stage</p>		
Department of Health IN24/16401	8.	<p>Thank you for your email dated 6 June 2024, requesting comment from the Department of Health (DoH) on the above proposal.</p> <p>The DoH provides the following comment:</p>	<p>Thank you for your submission. As per the Local Structure Plan, all residential development will be required to be connected to reticulated water and sewage services. Public health considerations have been accounted for, such as</p>	Noted.

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		<p>1. Water Supply and Wastewater Disposal</p> <p>Future development in the subject site must be connected to drinking water and sewage services provided by a licensed service provider.</p> <p>If sewage is intended to be reused or recycled for beneficial purposes such as landscape and garden bed irrigation, toilet flushing or other purposes, this will require prior approval from the DoH. Please refer to the “Application Process for approval of a recycling water scheme”:</p> <p>https://ww2.health.wa.gov.au/Articles/A_E/Application-process-for-approval-of-recycling-water-scheme</p> <p>2. Public Health Impacts</p> <p>It is recommended that public health impacts are considered as part of this amendment. The DoH has developed a document on ‘Evidence supporting the creation of environments that encourage healthy active living’ which may assist you with planning elements to ensure the best public health outcome for future residents. A copy may be downloaded from:</p> <p>https://www.health.wa.gov.au/~media/Files/Corporate/general-documents/Environmental-health/Health-risk-assesment/Evidence-statement-BE-Health.pdf</p> <p>In addition, the DoH’s publication on ‘Residential estates precincts and urban developments’ provides details of issues that should be considered at this planning stage. A copy may be downloaded from:</p>	<p>the expected positive effect of the proposed exercise/parkour facility, which is expected to encourage active recreation, particularly within the youth age group.</p>	

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		https://www.health.wa.gov.au/~media/Files/Corporate/general-documents/Environmental-health/Health-risk-assessment/Residential-estates-and-precincts.pdf .		
ATCO IN24/16726	9.	<p>ATCO Gas Australia (ATCO) has no objection to the proposed application, based on the information and plan provided.</p> <p>Advice notes:</p> <ol style="list-style-type: none"> 1. Anyone proposing to carry out construction or excavation works must contact 'Before You Dig Australia' (www.byda.com.au) to determine the location of buried gas infrastructure. Refer to ATCO document AGA-O&M-PR24-Additional Information for Working Around Gas Infrastructure https://www.atco.com/en-au/for-home/natural-gas/wa-gas-network/working-around-gas.html 2. Proposed construction and excavation works need to be managed in accordance with the ATCO document Additional Information for Working Around Gas Infrastructure - AGA-O&M-PR24 https://www.atco.com/en-au/for-home/natural-gas/wa-gas-network/working-around-gas.html 3. If the disconnection and/or removal of an ATCO gas service is required, a request can be submitted via the online ATCO portal found here. <p>Please accept this email as ATCO's written response.</p>	Thank you for your submission, the advice is noted.	Noted.

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Public Transport Authority (PTA) IN24/17033	10.	<p>PTA raises no objection to the proposed Structure Plan Amendment No 2 subject to the following comments:</p> <ol style="list-style-type: none"> 1. Part of the residential development is located within 100m of the Perth - Bunbury railway corridor reserve. The landowners should be made aware of transport noise impacts from current and future rail operations, which impacts cannot be fully mitigated. 2. Present and future noise impacts should be addressed through the planning process. Noise sensitive proposals will need to be supported by an acoustic assessment prepared by a suitably qualified professional and in accordance with WAPC State Planning Policy (SPP) 5.4 – <i>Road and Rail Noise</i>. 3. SPP 5.4 require placing notifications on new titles created over noise sensitive development within this transport noise impact area. The notifications should advise future transport noise and vibration impacts. 4. The acoustic assessment will set out noise mitigation requirements (e.g. quiet house design as appropriate under SPP 4.5). 	<p>Thank you for your submission. The LSP amendment states requirements for noise attenuation as per an acoustic assessment, and requires that acoustic assessments and noise management measures be implemented at the subdivision stage as necessary, in accordance with SPP 5.4.</p>	<p>Noted. Parts of the LSP area are within the stated trigger distance and are therefore subject to SPP 5.4. The amendment area is not within the trigger distance and therefore is not subject to SPP 5.4.</p>
Residents/Landowners				
	11.	<p>We shouldn't be sacrificing any public spaces, this end of town is already boring enough.</p>	<p>Thank you for your submission. The amendment proposes a reduction of POS within the</p>	<p>The Shire has expressed its expectation that should the land area for this POS be reduced, improvements to the offering of active (informal)</p>

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			<p>Doley Road Precinct LSP Area from 9.8% to 9.2%. As this proposes a further reduction from the Liveable Neighbourhoods requirement of 10%, the amendment is required to demonstrate a significantly improved recreational benefit to the community, through the design of the proposed POS.</p> <p>The amendment proposes the addition of a parkour exercise equipment, which was not previously included within the approved local structure plan. This amendment may be an opportunity to provide a unique active amenity to residents, particularly the youth age groups. Shire officers have recommended modifications to the LSP to ensure that this specific active recreation outcome is achieved within the POS design, to provide an</p>	<p>facilities within the resultant POS will need to be increased. The design for the POS currently shown in the LSP is for a passive park comprising mainly turf and garden beds.</p> <p>As a trade-off for the reduced area, the proponent has agreed that greater focus can be on active elements for the POS to improve engagement with the community. Elements such as play equipment, exercise equipment and/or parkour infrastructure have been discussed as options.</p>

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			increased community benefit.	
	12.	Any reduction in POS is actually unacceptable. With Greater Perth having the worst canopy in all of Australia, behind even Melbourne and Sydney, being disgraceful. These developers should be made to work around having more POS and keeping significant trees within their developments. Instead, it's all about the dollar and let's rape the ground! Let's face it, it doesn't matter what I say, or what the council eventually decides, they will appeal and it will be approved. When SJ becomes a concrete jungle, and it will, given how Byford looks currently, it will be too late!	Thank you for your submission. Delivering an urban canopy is highly valued by the Shire, as per the Shire's Urban and Rural Forest Strategy 2018-2028. The area of Lot 32 Doley Road, Byford which is subject to the future POS contains a row of immature trees, which the Shire recommends being retained where possible. The landscape plan associated with the proposed amendment does identify these trees for retention. Tree planting will be required, and urban canopy will be provided through the landscape design process, and within the surrounding residential area and verges where possible, at the subdivision stage.	The project team is aware of the tree canopy challenge facing Perth and believes that an holistic approach is required. POS is part of the solution, as are street trees and trees on private property (backyards and front yards). The concept plan for the revised POS that was submitted with this amendment request proposes a higher density of tree planting than was proposed in the original. Overall, POS across Byford is provided in accordance with the WAPC's Liveable Neighbourhoods policy and relevant Shire policies.

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	13.	<p>Within the Doley Road Precinct LOCAL STRUCTURE PLAN, CLE Town Planning + Design, PART ONE IMPLEMENTATION it is stated at, 6.3 Public Open Space:</p> <p>'The provision of a minimum 10% public open space being provided generally in accordance with Plan A', and further that, 'As a condition of subdivision approval for Lot 61 Lawrence Way, Byford, the subdivider will be required to make payment to the Shire of Serpentine-Jarrahdale for the sum equivalent to 700sqm, being that portion of the land that would otherwise be provided as open space prior to Amendment 1 of the structure plan.'</p> <p>Therefore, within the Doley Road Precinct Structure Plan (DRPSP) area the community will effectively lose 700m² of POS within the Lawrence Road POS.</p> <p>The amendment further proposes that:</p> <p>'The over-provision of POS in The Glades structure plan suggests that in a cross-boundary catchment area such as this, there may be adequate POS even with a reduced MUC. To investigate this, the abovementioned 300m walkable catchment has been overlaid on an amalgam of the two relevant structure plans and a POS Schedule produced – refer to Attachments 3 and 4. The POS Schedule confirms that the 300m walkable catchment of the Lot 32 POS has a provision rate of 14.0%, and an unrestricted provision rate of 13.8%. These outcomes exceed the requirements of Liveable Neighbourhoods, which are for a 10% rate of provision, 80% of which must be unrestricted.'</p>	<p>Thank you for your submission.</p> <p>The amendment has not provided a POS Schedule over the Doley Road Precinct LSP Area, instead providing a POS Schedule utilising a catchment area named the 'Glades/Beenyup Grove interface area, around Lot 32 Doley Road, Byford'. This catchment does not cover the entire Doley Road Precinct LSP area, and instead encompasses portions of the Byford Main Precinct the Glades Local Structure Plan. Shire officers have recommended modifications for a revised POS Schedule be prepared.</p> <p>Given that the amendment proposes a further reduction from the Liveable Neighbourhoods requirement of 10%, the amendment is required to demonstrate a significantly</p>	<p>The arrangement made for Lot 61 Lawrence Way via Amendment 1 to the LSP will generate funding for the Shire to undertake improvements to local POS to increase its useability, as this is not wholly reliant on the size of the POS. This aside, Amendment 2 needs to be assessed on its own merits.</p> <p>Liveable Neighbourhoods is structured on the basis of walkable catchments and neighbourhoods. Structure plans are often compiled on the basis of cadastre and historical land ownership, and therefore do not always correlate with walkable catchments or neighbourhoods (they may, for example, cover half of a catchment, with the other half covered by another structure plan). This is very much the case in Byford where land ownership is historically fragmented and structure</p>

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		<p>This statement and subsequent calculation is an unreasonable manipulation of WAPC's Liveable Neighbourhoods 10% POS allocation, which mandates 10% POS for each structure plan area. To include the Glades SP within the DRPSP calculation is not in line with the intent of Liveable Neighbourhoods. Is this even statutorily legal? The community should not be penalised by the reduction of POS in one SP area because of an over allocation in another SP area. Noting here, that the over allocation in the Glades SP area is generally a MUC calculated as part of the 2% drainage function of the POS.</p> <p>Also noting that the DRPSP POS has already been reduced by 700m² in the Lawrence Road POS. The proposal to further reduced POS within the living stream area of the DRPSP and the useable space in the Doley Road POS by a further 600m² is strongly opposed and appears to be an exercise in increasing lot yield and developer profit over and above the provision of fair and equitable community parks and recreation unrestricted POS.</p> <p>All proposed modifications and amendments that propose a reduction in public open space within the DRPSP area are therefore strongly opposed.</p>	<p>improved recreational benefit to the community, through the design of the POS. The amendment proposes the addition of a parkour exercise equipment, providing a unique active amenity to residents, particularly the youth age groups. Shire officers have recommended modifications to the LSP to ensure that this specific active recreation outcome is achieved within the POS design, to provide an increased community benefit.</p>	<p>plans have been created with irregular boundaries as a result. This situation is now common in the greenfield parts of Perth due to consolidated land parcels becoming difficult for developers to find.</p> <p>The over-allocation in the Glades is partly related to the MUC, but this policy area is regulated in the sense that only up to 2% of POS that provides a 1:5 year drainage function can count as POS, so this is not the sole driver. The role of POS is also broader than simply providing space for recreation; it is also about visual amenity, ecology and drainage, among other things. Land area, although important, is not the sole determinant of the usefulness of a particular POS or POS network.</p>